IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

UNITED STATES OF AMERICA)
Plaintiff,))
v.) No. 4:16-CR-159 AGF
LOREN COPP)
Defendant.)

<u>DEFENDANT'S SUPPLEMENT TO HIS PREVIOUSLY FILED MOTION TO</u> <u>SUPPRESS STATEMENTS & EVIDENCE</u>

Loren Copp, through counsel Assistant Federal Public Defender Charles J. Banks, respectfully supplements his previously filed *Motion to Suppress Statements & Evidence* (Document #59) as follows:

- On March 31, 2017 the government made a supplemental disclosure of discovery to the defense, as memorialized in Document #66. This disclosure included, among other items, records obtained through the use of 3 federal search warrants.
- 2. The government obtained each of these search warrants by relying on information challenged in Mr. Copp's *Motion to Suppress Statements & Evidence* (Document #59).
- 3. For the reasons stated in that motion, Mr. Copp avers that the warrants and any information gained pursuant to their execution constitute "fruit from the poisonous tree" *Wong Sun v. United States*, 371 U.S. 471 (1963), and such evidence should be suppressed from use against him at trial.

WHEREFORE Mr. Copp incorporates Document #59 as if fully set forth herein, and respectfully moves this Honorable Court to suppress all evidence procured through the 3 above-named search warrants.

Respectfully submitted,

/s/Charles J. Banks CHARLES J. BANKS Assistant Federal Public Defender 1010 Market Street, Suite 200 St. Louis, Missouri 63101 Telephone: (314) 241-1255 Fax: (314) 421-3177

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ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on May 2, 2017, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Jennifer Winfield, Assistant United States Attorney.

/s/Charles J. Banks CHARLES J. BANKS Assistant Federal Public Defender